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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE BONILLA,

15 Defendant.
16

CASE NO. CR-07-00251 RMW

EX PARTE APPLICATION FOR
AN EMERGENCY TRAVEL ORDER
ON BEHALF OF JOSE BONILLA

17 I, ROBERT E. CAREY, JR., declare:

18 1. I am an attorney licensed to practice law in the State of California
19 and before this Court.

20 2. I have been appointed by the court to represent JOSE BONILLA, the
21 Defendant in this matter.

22 3. On April 24, I received a telephone call from Ms. Patty Bonilla, the
23 wife of JOSE BONILLA. She informed me that JOSE BONILLA'S father, Jose
24 Bonilla, Sr., had suffered a stroke the day before and was currently a patient
25 at Los Banos Hospital, which is located at 520 West I Street, Los Banos,
26 California 93635. She further indicated that Mr. Bonilla, Sr. is in room 201, bed
27 2, of that hospital.

28 4. Ms. Bonilla further informed me that various relatives and friends

1 had told her that Mr. Bonilla, Sr., had suffered a stroke and was in critical
2 condition at the hospital. She requested permission for JOSE BONILLA to visit
3 the hospital in Los Banos, California, so that JOSE could see his father; further,
4 she informed me that the children would be accompanying JOSE for such a
5 visit.

6 5. Following that conversation, I telephoned the Assistant U.S.
7 Attorney in charge of this case, Thomas O'Connell, Esq., and left a message
8 requesting permission for Mr. BONILLA to travel to Los Banos; further, that as
9 of this time, I have not heard back from Mr. O'Connell.

10 6. I then telephoned Anthony Granados, the pretrial services officer
11 in charge of Mr. BONILLA's case. He indicated that he had no objection to such
12 a trip by Mr. BONILLA to Los Banos, California; further, he indicated that Mr.
13 BONILLA was complying with the rules and regulations of pretrial services with
14 regard to the conditions of his pretrial release.

15 7. Based upon the foregoing, I respectfully request that Mr. BONILLA
16 be granted permission to travel to Los Banos, California to visit his father at the
17 Los Banos Hospital during the period of April 25, 2009, through April 28, 2009.

18 I declare under the penalty of perjury under the laws of the State of
19 California that the foregoing is true and correct, and that this declaration is
20 made on April 24, 2009 at Palo Alto, California.

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22 /S/
23 ROBERT E. CAREY, JR.
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